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Colorado Department
of Public Health
and Environment

November 22, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, Rocky Flats Field Office
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of RCRA Container Storage Unit 15, and RCRA Treatment Unit 35 located at the 904 Pad

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed your November 13, 2002 letter and the accompanying notification package received on November 13, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of permitted Container Storage Unit 15 and the remaining portions of interim status RCRA Treatment Unit 35, both located at the 904 Pad. RCRA Container Storage Unit 15 includes the 904 Pad and the 902 Pad where containers of hazardous/mixed waste were stored on asphalt. Containers of hazardous/mixed waste were stored inside Tent 7 at the 902 Pad. Containers of hazardous/mixed wastes were stored primarily inside Tents 8 through 11 at the 904 Pad, but some containers of hazardous/mixed waste were stored outdoors at the 904 Pad. The remaining portion of RCRA Treatment Unit 35 consists of a Permacon structure located in Tent 10 at the 904 Pad. RCRA Unit 35 was used for reprocessing low-level mixed (LLM) pondcrete and saltcrete wastes. Additionally, a Permacon in Tent 11 at the 904 Pad was incorporated into RCRA Unit 15 in 1999 and used for repackaging of hazardous/mixed waste chemicals.

We hereby formally agree that the appropriate activities described in the notification may proceed utilizing the Component RSOP, with the following conditions:

1. The rinsing of the asphalt pad will need to be conducted in accordance with the requirements for the final rinsate as described under Clean Closure Option #2 under Section 5.1.1 of the Component RSOP. Additionally, the rinsate will need to be managed to minimize volatilization of any volatile organic compounds (VOCs) that may be present.
2. The secondary containment pans in the permitted cargo containers in Unit 15 will either need to be disposed of as hazardous waste; treated in accordance with 6 CCR 1007-3, Section 268.45 to possibly be disposed of as non-hazardous debris; or be verified clean by rinsing them and sampling



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1/2

and analyzing the rinsate for hazardous waste constituents that have been managed in the unit. In an e-mail message dated November 12, 2002 from Kim Myers of Kaiser-Hill to James Hindman of the Division, RFETS has proposed to rinse the pans and then sample and analyze the rinsate to verify whether or not the pans are clean. This is acceptable to the Division, but the rinsate must be applied and collected in accordance with the requirements for the final rinsate as described under Clean Closure Option #2 under Section 5.1.1 of the Component RSOP. Additionally, the rinsate will need to be managed to minimize volatilization of any volatile organic compounds (VOCs) that may be present.

3. As indicated in the Reconnaissance Level Characterization Reports (RLCRs) for tents 8-11 on the 904 Pad, a Pre-Demolition Survey (PDS) will need to be performed for each of these tents prior to their dismantlement. The performance of the RCRA closure activities does not relieve the need to perform the PDS.
4. It is stated in your letter that, "The subcontractor will conduct work in accordance with its work control documentation." The utilization of the approved Component RSOP includes the implementation of the work control process as provided therein. As such, the subcontractor's work control process must adhere to that described in the Component RSOP, or it must be shown to be equivalent. Any variation from the work control process as described and approved in the Component RSOP must be identified and appropriate rationale provided for our approval. Additionally, the Division requests that Integrated Work Control Packages (IWCP), or equivalent, be provided for review at least seven (7) calendar days before beginning the work described therein for the 904 Pad and related structures.
5. In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division. The certification of closure will need to be signed by the facility and by an independent Colorado registered professional engineer (P.E.) in accordance with the requirements of the approved Closure Plan and Section 264.115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed. Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P.E. will be involved in the closure process to the extent necessary to adequately certify closure.

As indicated in your letter, the consultative process must be utilized to keep us informed of the decommissioning strategy, planning, and activities for this project. If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or James Hindman at (303) 692-3345.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: S. MacLeod, DOE-RFFO
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12

